

- E X H I B I T A -

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
MARGARET EUROPE,

Plaintiff,

-against-

STOP & SHOP SUPERMARKET CO., LLC.,

Defendants.

Index No.:

Date Filed:

Plaintiff designates Kings County
as the place of trial

The basis of the venue is place of
Occurrence

SUMMONS

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To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorneys Gary P. Kauget, P.C. within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York

Defendant's Address:

Stop and Shop Supermarket: 1009 Flatbush Avenue, Brooklyn, NY 11226



Gary P. Kauget, P.C.
Attorneys for Plaintiff
9201 Fourth Avenue, Suite 200A
Brooklyn, NY 11209
(718) 833-2496

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
MARGARET EUROPE,

Plaintiff,

VERIFIED COMPLAINT

-against-

Index Number:

Date Filed:

STOP & SHOP SUPERMARKET CO., LLC,

Defendants.

-----X

Plaintiff, by her attorney, Gary P. Kauget, P.C.
complaining of the defendant, STOP AND SHOP SUPERMARKET, CO., LLC.,
alleges upon information and belief as follows:

FIRST: Upon information and belief, that at
all times hereinafter mentioned defendant, STOP AND SHOP
SUPERMAREKT CO., LLC, was and is a domestic corporation, organized
and existing under and by virtue of the laws of the State of New
York, and maintains its principal office in the County of Kings,
State of New York.

SECOND: Upon information and belief, that at
all times and places hereinafter mentioned, the defendant, STOP
AND SHOP SUPERMAREKT CO., LLC., was a corporation duly organized
and existing under and by virtue of the laws of the State of New
York.

THIRD: Upon information and belief, that at
all times and places hereinafter mentioned, the defendant, STOP

AND SHOP SUPERMAREKT CO., LLC., was a foreign corporation doing business in the State of New York.

FOURTH: That at all times herein mentioned the defendant, STOP AND SHOP SUPERMAREKT CO., LLC., its agents, servants and employees controlled the premises known as and by 1009 Flatbush Avenue, in the County of Kings, City and State of New York.

FIFTH: That at all times herein mentioned the defendant, STOP AND SHOP SUPERMAREKT CO., LLC, its agents, servants and employees maintained the premises known as and by 1009 Flatbush Avenue, in the County of Kings, City and State of New York.

SIXTH: That at all times herein mentioned the defendant, STOP AND SHOP SUPERMAREKT CO., LLC, its agents, servants and employees managed the premises known as and by 1009 Flatbush Avenue, in the County of Kings, City and State of New York.

SEVENTH: That at all times herein mentioned the defendant, STOP AND SHOP SUPERMAREKT CO., LLC, its agents, servants and employees owned the premises known as and by 1009 Flatbush Avenue, in the County of Kings, City and State of New York.

EIGHTH: That the defendant, STOP AND SHOP SUPERMAREKT CO., LLC, its agents, servants and employees had a

duty to properly maintain said premises and to keep said premises in a reasonably safe condition.

NINTH: That the defendants, STOP AND SHOP SUPERMAREKT CO., LLC, its agents, servants and employees breached their duty to maintain said premises and to keep said premises in a reasonably safe condition.

TENTH: That on December 11, 2017 the plaintiff, MARGARET EUROPE, was lawfully upon said premises.

ELEVENTH: That on December 11, 2017, while lawfully upon said premises, the plaintiff, MARGARET EUROPE, was caused to slip and fall and sustain serious and severe personal injuries as a result of the negligence of the defendant, its agents, servants, and employees.

TWELFTH: That the foregoing occurrence was caused solely and wholly as a result of the negligence of the defendant, its agents, servants, and employees, without any negligence on the part of the plaintiff contributing thereto.

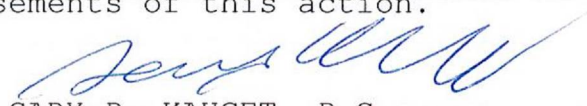
THIRTEENTH: That as a result of the foregoing, plaintiff, MARGARET EUROPE, sustained serious, severe and permanent personal injuries.

FOURTEENTH: That this action falls within one or more of the exceptions set forth in CPLR 1602.

FIFTEENTH: That as a result of the foregoing plaintiff has been damaged in an amount that exceeds all of the

jurisdictional limits of the lower Courts.

WHEREFORE, plaintiff demands judgment against the defendants in an amount to be determined at the time of trial, together with the costs and disbursements of this action.



GARY P. KAUGET, P.C.
Attorney for Plaintiff
9201 Fourth Avenue, Suite 200A
Brooklyn, NY 11209
(718) 833-2496

VERIFICATION BY AFFIDAVIT

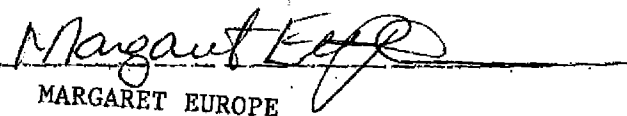
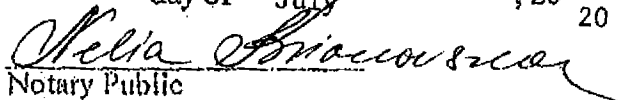
STATE OF NEW YORK

SS:

COUNTY OF KINGS

MARGARET EUROPE, being duly sworn, says:

I am a Plaintiff in the action herein; I have read the annexed COMPLAINT and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my personal files.

DATED: Brooklyn, New York
July 9, 2020
MARGARET EUROPESworn to before me this
9 day of July, 2020
Notary PublicNela Krioukovskaya
Notary Public State of NY
No 01KR6047381
Qualified in Kings County
Commission Expires August 28, 2022

Index No.
SUPREME COURT OF THE STATE OF NEW YORK
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MARGARET EUROPE,

Plaintiff(s),

-against-

STOP AND SHOP SUPERMARKET CO., LLC,

Defendant(s).

SUMMONS & VERIFIED COMPLAINT

GARY P. KAUGET, PC
Attorneys for Plaintiff(s)
9201 Fourth Ave, Suite 200A
Brooklyn, NY 11209
(718) 833 2496

Certification Pursuant to 22 NYCRR 130-1.1a

To the best of the undersigned's knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the within documents and contentions therein are not frivolous as defined in 22 NYCRR 130-1.1a

Brooklyn, NY

Gary P. Kauget, PC